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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

DEC 15 1982

MEMORANDUM FOR: All NRR Employees

FROM: Harold R. Denton, Director
Office of Nuclear Reactor Regulation

SUBJECT: NRR OFFICE LETTER NO. 41
NRC ALLEGATION TRACKING SYSTEM

The EDO implemented the Allegation Tracking System on December 6, 1982 for all allegations on or after that date. The purpose of this system is to track the receipt, disposition, and status of all allegations involving NRC licensees or NRC licensed activities and to provide periodic status reports on allegations to NRC management. The system is necessary since these allegations may ultimately have an effect on pending major actions such as licensing decisions or escalated enforcement.

This Office procedure places the responsibility on all NRR employees to report allegations according to this procedure. I would like to emphasize that it is the responsibility of the NRR staff member who receives the allegation to enter the allegation into this system. Exhibit 3 shows a typical flow path. Forms are available at each NRR Division. Any questions you have regarding the proper methods or intent of this procedure should be directed to the Office Coordinator (Technical Assistant, Division of Licensing).

The first 90 to 120 days after implementation of this system will be used to test and evaluate these reporting procedures and the information accumulated to determine if the system needs modification. Following this the procedures will be finalized for an NRC Manual Chapter.

for/ Harold R. Denton, Director
Office of Nuclear Reactor Regulation

Enclosure:
As Stated

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Enclosure 1

NRC ALLEGATION TRACKING SYSTEM

PURPOSE

To track the receipt, disposition, and status of allegations involving NRC licensees or NRC licensed activities and to provide periodic status reports on allegations to NRC management.

OBJECTIVES

1. To provide a record which demonstrates that allegations are reviewed, acted upon as appropriate, and receive proper NRC management attention.

2. To provide periodic reports to management on the status of allegations and to alert management of allegations that may have an effect on pending major actions such as licensing decisions or escalated enforcement.

DEFINITIONS

1. Action Office. The NRC office which is responsible for reviewing and taking action, as appropriate, on allegations involving matters under the purview of that office.

2. Action Office Contact. The staff member in the Action Office who is assigned the responsibility for the action to be taken on an allegation.

3. Allegation. For purposes of the tracking system, an allegation is considered to be any assertion of wrong-doing, lack of compliance, or hazard to public health and safety or national security involving an NRC regulated activity. This does not include the finding(s) of internal NRC activities such as inspection or licensing review.

4. Office Coordinator. A designated staff member in each office who serves as the principal point of contact for that office regarding the disposition of allegations.

5. Receiving Office. The office which initially receives an allegation. In some cases, the Action Office and Receiving Office will be the same if the allegation falls within the functional responsibility of the Receiving Office.

RESPONSIBILITIES

1. Each Office Director/Regional Administrator. The basic requirements of this procedure for implementation and maintenance of the NRC Allegation Tracking System shall be followed by each office. Each Office Director shall:

   a. Develop internal procedures to implement the tracking system.

   b. Designate a staff member to serve as Office Coordinator and point of contact for matters involving the tracking system.

   c. Ensure information provided as input and/or updates to the tracking system is accurate and timely.

   d. Provide notification upon request to other program offices of the status of significant allegations.

   e. Prior to major action such as licensing decisions or escalated enforcement, check on the status of allegations reported in the tracking system.

2. Office Coordinator (Technical Assistant Division of Licensing) - is responsible to:

   a. Serve as office point of contact for matters involving the NRC Allegation Tracking System.

   b. Ensure completion of the appropriate parts of the Allegation Data Form for all allegations received within his or her respective office.

   c. Determine the appropriate Action Office and coordinate with the Action Office Coordinator on each allegation received by his or her office.

   d. Complete the appropriate parts of the Allegation Data Form for all allegations for which his or her office is the Action Office.

   e. Forward the Allegation Data Form to the Action Office Coordinator when his or her office is not the Action Office.

   f. Forward the completed Allegation Data Form to IE within 10 working days of receipt of an allegation when his or her office is the Action Office.

   g. Acquire input and updates on allegations from the staff within his or her office and provide this information to IE on a monthly basis.

3. Office of Inspection and Enforcement (IE). IE is responsible for managing the tracking system and providing monthly status reports to each office.

BASIC REQUIREMENTS

General

1. For purposes of the Allegation Tracking System the definition provided for an allegation is very general and broad. The significance or non-significance of an allegation will be judged during the Action Office review and followup of the allegation. There is to be no screening of allegations prior to entering them into the system (except of course for duplication of entries). The tracking system should provide a vehicle for collecting all allegations. The Action Office determines the necessary action to be taken based upon the specifics of the case. Some allegations may be received and closed out the same day.

2. The tracking system provides basic descriptive and status information and serves as a referral system. It identifies the office and staff to contact for more specifics on an allegation.

3. When an allegation is received, it is not necessary to identify by separate entry into the tracking system every component or subset of the allegation. For example, if an allegation is received that makes 15 separate assertions of wrong-doing, the allegation may be entered as one allegation with a brief general description of the types of assertions. In some cases there may be a distinct grouping of assertions, for example, in two areas such as training and quality assurance. In such a case it may be appropriate to enter two allegations. A main objective is to ensure that the receipt of an allegation is entered and tracked in the system. An allegation is not completed and closed until an Action Office supervisor determines that appropriate action has been taken.

4. Sensitive information such as the names of persons making allegations or about whom allegations are made shall not be entered in the system. All information entered on the form shall be unclassified and shall not contain any safeguards information or any proprietary or commercial (2.790) information.

5. Some allegations may require action by two or more offices. For purposes of entering the allegation into the tracking system, either separate entries should be made for each Action Office for their assigned action or one entry may be made with the involved Action Office Coordinators agreeing on the lead Action Office for followup of the allegation. If another office is involved in responding to an allegation, it should be so indicated in the "remarks" section.

Receiving Office

Upon receipt of an allegation involving an NRC regulated activity, the Receiving Office should:

1. Complete the appropriate parts of the Allegation Data Form. Exhibit 1 contains the Allegation Data Form. Specific instructions for completion of the form are contained on the reverse side of the form.

2. Determine the appropriate Action Office, coordinate with the Action Office, and receive concurrence from the Action Office before transfer of responsibility.

3. Forward the Allegation Data Form to the Action Office if different from Receiving Office.

The Office Coordinator is responsible for ensuring that these actions are completed.

Action Office

1. Completes the Allegation Data Form and forwards a copy of the form to IE within 10 working days of the date of receipt of the allegation.

2. Provides updates to IE on a monthly basis by indicating updates on the previous month's status report. Updates are due to IE by the 25th of each month. All input to IE for the tracking system should be sent in "addressee only" envelopes to, "Allegation Tracking System, Program Support Branch (E/W-W 359). Completion of the followup action for an allegation will be recorded by updating the monthly status report.

The Office Coordinator is responsible for ensuring that these actions are completed.

IE

1. Upon receipt of an Allegation Data Form and updates, IE will input the information into the tracking system.

2. IE will issue monthly status reports on or about the first day of each month. The monthly report will include all new allegations and all updates received by IE as of the 25th of the previous month. The format for the status report is provided in Exhibit 2.

NRC Form 307
(11-82)

EXHIBIT 1

U.S. NUCLEAR REGULATORY COMMISSION

ALLEGATION DATA FORM

Instructions on reverse side

RECEIVING OFFICE

1. **Facility(ies) Involved:** (If more than 3, or if generic, write GENERIC)

(Name) ______________________ Docket Number (if applicable) ☐☐☐ ☐☐☐☐☐

______________________ ☐☐☐ ☐☐☐☐☐

______________________ ☐☐☐ ☐☐☐☐☐

2. **Functional Area(s) Involved:** (Check appropriate box(es))

☐ operations
☐ construction
☐ safeguards
☐ other (Specify) ______________________
☐ onsite health and safety
☐ offsite health and safety
☐ emergency preparedness

3. **Description:** (Limit to 100 characters)

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4. **Source of Allegation:** (Check appropriate box)

☐ contractor employee
☐ licensee employee
☐ NRC employee
☐ organization (Specify) ______________________
☐ other (Specify) ______________________
☐ security guard
☐ news media
☐ private citizen

5. **Date Allegation Received:** MM ☐☐ DD ☐☐ YY ☐☐

6. **Name of Individual Receiving Allegation:** (First two initials and last name) ______________________

7. **Office:** ☐☐☐☐

ACTION OFFICE

8. **Action Office Contact:** (First two initials and last name) ______________________

9. **FTS Telephone Number:** ☐☐☐ - ☐☐☐☐

10. **Status:** (Check one)

☐ Open, if followup actions are pending or in progress
☐ Closed, if followup actions are completed

11. **Date Closed:** MM ☐☐ DD ☐☐ YY ☐☐

12. **Remarks:** (Limit to 50 characters)

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13. **Allegation Number:** Office ☐☐☐☐ - Year ☐☐ -A- Number ☐☐☐☐

The following are specific instructions for completing each of the required items on the Allegation Data Form.

The first part of the form (items 1 - 7) should be completed by the Office receiving the allegation. The remainder of the form (items 8 - 13) should be completed by the Office responsible for reviewing and taking action on the allegation.

1.	Facility(ies) Involved:	Give the name of the facility(ies) or company(ies) about whom the allegation is made. Write the docket number, if appropriate, in the boxes to the right. If the allegation is made about a specific individual or if the information in this item is otherwise sensitive, write SENSITIVE. If more than three facilities or companies are involved write GENERIC.
2.	Functional Area(s) Involved:	Check all applicable boxes.
3.	Description:	Briefly describe the allegation (1 or 2 sentences). Be concise. If an allegation includes several instances of wrong doing list the assertions separately or group them by type. NOTE: if the description of the allegation is sensitive, write only SENSITIVE.
4.	Source of Allegation:	Check the box that most clearly describes the affiliation or occupation of the person making the allegation. DO NOT include the name of the individual making the allegation.
5.	Date Allegation Received:	Show the month, day, and year on which the allegation was reported to NRC.
6.	Name of Individual Receiving Allegation:	Give the NRC staff member's first and middle initials and last name.
7.	Office:	Use official NRC abbreviations to indicate the NRC Office receiving the allegation.
8.	Action Office Contact:	Write the first and middle initials and last name of the NRC staff member responsible for follow-up action on the allegation.
9.	FTS Telephone Number:	Write the seven-digit FTS telephone number at which the Action Office Contact (see item 8) can be reached.
10.	Status:	Check the appropriate box.
11.	Date Closed:	Show the month, day, and year on which the follow-up action was completed.
12.	Remarks:	Include additional information as appropriate. EXAMPLES: list other allegations related to this allegation; list other NRC offices responsible for follow-up activities on this allegation.
13.	Allegation Number:	Fill in the boxes to uniquely identify this allegation: OFFICE -- official NRC office abbreviation for the Office responsible for follow-up activities. YEAR -- last two digits of the calendar year in which the allegation was reported to NRC. A -- identifies this number as an allegation number. NUMBER -- sequential number assigned by the Office responsible for the follow-up activities. EXAMPLE: The 24th allegation received by IE in 1982 would be shown as IE-82-A-0024

EXHIBIT 2

NRC ALLEGATION TRACKING SYSTEM
STATUS REPORT FOR PENDING AND ACTIVE ALLEGATIONS

FACILITY INVOLVED	ALLEGATION NUMBER	DESCRIPTION OF ALLEGATION	DATE ALLEGATION RECEIVED	FUNCTIONAL AREAS INVOLVED	ACTION OFFICE	ACTION OFFICE CONTACT	REMARKS
--sorted by 1. docket & allegation # 2. generic & allegation # 3. name & allegation #, if no docket #							

EXHIBIT 3

NRG ALLEGATION TRACKING SYSTEM
FLOW CHART
(TYPICAL)